

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 760 & 862

**CERTIFICATION OF COUNSEL REGARDING FIRST NOTICE
OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the First Assumption Notice (the “Original Assumption List”). Attached to the First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Original Assumption List.

2. The deadline to object to the First Assumption Notice was May 12, 2025 (the “Objection Deadline”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Objection Deadline, Younger Partners Investments, LLC, on behalf of Midlo Younger, LLC (“Midlo Younger”) filed the *Objection of Younger Investments to Proposed Cure Amounts* [Docket No. 862] which was thereafter amended by the *Amended Objection of Younger Investments to Proposed Cure Amounts* (as amended, the “Midlo Younger Objection”) objecting to, among other things, the assumption and assignment of a certain nonresidential real property lease (the “Midlo Younger Lease Agreement”) dated March 9, 2017 between Jo-Ann Stores, LLC and Midlo Younger that was included on the Original Assumption List.

4. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”), which resolves the Midlo Younger Objection as it pertains to the Midlo Younger Lease Agreement (the other portion of the Midlo Younger Objection, pertaining to the lease for Store No. 380, was previously resolved and an order pertaining to Store No. 380 was entered at Docket No. 1091 such that the Midlo Younger Objection is now resolved in full). A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**. As part of the resolution of the Midlo Younger Objection, the landlord has agreed that the applicable lease can be assumed and assigned as set forth in the Revised Assumption Order.

5. Any leases subject to unresolved objections and informal comments received regarding the remaining balance of the leases included in the First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the objecting landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

6. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: June 11, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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